

REAL ALLOY



Real Alloy Recycling, LLC
267 N. Fillmore Road
Coldwater, MI 49036

November 6, 2023

Mr. Michael Cox
Air Quality Division
EGLE Air Quality Division
Kalamazoo District
7953 Adobe Rd.
Kalamazoo, MI 49009

RECEIVED
NOV 09 2023
AQD - KALAMAZOO

**Re: Real Alloy Specification, LLC
Notice of Violation written 10/19/2023
SRN N5957 – City of Coldwater, Branch County, Michigan**

Dear Mr. Cox:

Real Alloy Recycling, LLC and Real Alloy Specification, LLC (collectively referred to as Real Alloy) is submitting this written response to the violation notice dated October 19, 2023 as it pertains to our Renewable Operating Permit (ROP) number MI-ROP-N5957-2022.

Table 1. below identifies the written Notice of Violation (NOV) description, causes, duration, summary of actions taken or proposed, date closure is expected, and actions that will prevent a reoccurrence.

If you should have any questions regarding this response, please contact David Likens at (517) 279-4056.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Bryant".

Doug Bryant
Plant Manager

cc (electronically): David Likens, Real Alloy, Coldwater
Jennifer Zavoda, Real Alloy, Beachwood

Table 1. NOV Description

Date	Emission Unit	Rule/Permit Condition Violated	Description of Violation	Cause of Violation	Duration Permit Violation	Actions Taken or Proposed to Prevent a Reoccurrence
7/25/2023	EUALFURN1/ SVALFURN1	MI-ROP-N5957-2022, EUALFURN1, Special Condition (SC) I.17	Exceedance of permitted PM10 & PM2.5 hourly emission limits during stack testing conducted on July 25-26, 2023.	The PM10 and PM2.5 emission limits for the SVALFURN1 were set at lower rates compared to similar source parameters in the MI-ROP-N5957-2022 permit.	During the 3 stack test runs (approx. 444 minutes).	Real Alloy is preparing a permit modification to rebalance the PM10 and PM 2.5 emission limits across similar sources at the site. The modification application is expected to be submitted in December 2023.
7/25/2023	EUALFURN1/ SVALBH1	MI-ROP-N5957-2022, EUALFURN1, SC I.5	Exceedance of permitted chlorine (Cl) hourly emission limits based on stack test results from testing conducted on July 25-27, 2023.	During stack testing, lime flow to the baghouse was lowered. This resulted in Cl levels exceeding the limit.	During the 3rd stack test run (approx. 152 minutes).	Following the 3 rd test run, lime flow rate was increased to the previously established rate in the OM&M plan. Real Alloy is preparing a permit modification to rebalance the Cl emission limits across similar sources at the site. The modification application is expected to be submitted in December 2023.